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Michigan Occupational Safety and Health Administration (MIOSHA)

Summer 2004

# New Enforcement Approach

# Focused Inspections Target Serious General Industry Hazards

By: John Brennan, Director General Industry Safety and Health Division

As an alternative to traditional wall-to-wall inspections, the General Industry Safety and Health Division has piloted a focused concept, which seeks to identify hazards posing serious risks to employee safety and health.

Under the focused approach, MIOSHA compliance officers limit the inspection to the work, machines and processes, which contribute to an organization's major work activity. When these areas are found to be in compliance, the inspection is considered completed at that time. If, however, significant serious issues are identified, the inspection is expanded into the traditional wall-to-wall concept.

The pilot concept was first used by MIOSHA as an approach to inspections at facilities covered by partnerships between the UAW, Ford, Visteon and MIOSHA. Under the partnership, protocols were developed to guide inspection activity. The protocols focused on the

significant industry hazards and on the hazards where injury records indicated the most incidents were occurring. One of the benefits that partnerships between MIOSHA and an employer bring is the opportunity to try new strategies and approaches that can be expanded to other program areas as appropriate.

# Food Products Industry Pilot

In November 2004, MIOSHA began the general industry pilot, focusing on the Food Products Industry. This industry was selected based on MIOSHA Strategic Plan goals, specifically reducing amputation injuries.

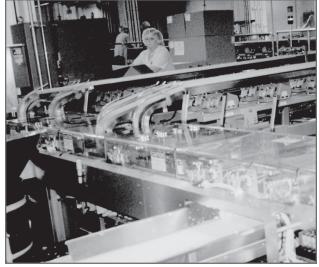
The Winter 2003 edition of the MIOSHA News included the new MIOSHA scheduling plan for general industry based on MIOSHA's Strategic Plan for FY 2004-2008. This new plan, which was effective October 1, 2003, identifies specific industries and injuries/illnesses for priority program attention. Reducing amputation injuries is a priority area of the Strategic Plan, with Food Products (SIC 20/NICS 311) as an industry included within this goal.

> The pilot provided an opportunity for MIOSHA to determine whether focused inspections are an effective use of agency resources. It was hoped the focused inspections would provide the ability to identify significant workplace safety hazards.

> The pilot also allowed the agency to determine whether the focused approach resulted in: reduced inspection time at the sites, increased number of workplaces visited in a year, and more employees covered by MIOSHA inspections. In addition, the focused concept allowed the agency to focus the inspection on hazards that data Cont. on Page 18

**Labor & Economic Growth** 





Machine guarding is necessary to protect bakery workers from pinch point injuries on cookie production lines.





# From the Bureau Director's Desk





Improved Consistency,
Uniformity, and
Efficiency in All
MIOSHA Services

Over the past year, MIOSHA has formally recognized several employers and their employees for outstanding accomplishments in their safety and health programs. These successes were only realized through tremendous commitment and hard work every month, every week, every day. These employers and employees know that to maintain these results and to see even more improvements requires that they continue to work hard and to adjust their approaches to meet the needs of Michigan's everchanging workplaces.

All of us in the MIOSHA Program understand the efforts and adaptations needed to maintain effective safety and health programs. Similarly, we recognize the **we** need to continually **work hard** and **make changes** in our own programs to help reduce injuries, illnesses and fatalities and to improve the delivery of our services in Michigan.

# Improving MIOSHA Services

In 1996, the MIOSHA Program was consolidated under one roof after more than 20 years of being in two different departments. In 1998, we combined the safety and health operations of our consultation and outreach programs. Seeing a clear need for improved consistency, uniformity and efficiency in our enforcement programs, we made even more changes late last year.

The four enforcement divisions—General Industry Safety, Construction Safety, Occupational Health, and Employee Discrimination—were combined into two Divisions—the General Industry Safety and Health Division and the Construction Safety and Health Division. We also consolidated the programs that provide agency-wide services into a single Management and Technical Services Division. The operations in this division include laboratory services, equipment maintenance, freedom of information, data collection and analysis, budgetary functions, and information technology.

Our overall goal is to provide the best assistance to Michigan employers and employees. Although it has only been a few months since these latest changes were made, a number of improvements have been implemented.

# **Key Improvements**

- The agency's name was changed from the Bureau of Safety and Regulation to the Michigan Occupational Safety and Health Administration (MIOSHA), making it easier for employers and employees find us.
- Joint safety and health inspections are conducted whenever conditions indicate that both issues are pertinent. This ap-

proach improves our efficiency and response times. It also makes the inspection process simpler for employers and employees.

- An increased emphasis on health issues in the construction industry has been initiated. The Construction Safety and Health Division has developed strategic goals to significantly reduce employee illnesses and disease associated with exposures to asbestos, lead, silica and noise. (See article Page 8.)
- A focused inspection process has been piloted in the General Industry Safety and Health Division for the food processing industry with positive results. In this pilot, inspections focus on the hazards most likely to cause serious injuries and illnesses. The focused inspections allow MIOSHA staff to identify and address serious issues through an expedited inspection process. (See cover article.)
- Uniform interpretive instructions/directives have been established to better clarify issues related to enforcement for our staff and stakeholders.
  - Employees can now file complaints on-line, 24 hours per day.
- Enhanced cross-training opportunities have improved our ability and efficiency in identifying safety and health hazards.
- A number of projects, using internal workgroups, are underway to identify and implement strategies to improve overall efficiency of the MIOSHA operations.
- Citation wording has been rewritten into a more "plain language" format. Along with the plain language rewrite, the revision provides more concise, easier to understand information.
- Uniform approaches to Informal Settlement Agreements, first appeals, second appeals and formal settlement agreements have been developed and continue to be refined.
- The consolidation of the Freedom of Information Act processes has resulted in more uniform and timely responses to the 100-plus requests for information that MIOSHA receives each month.

These are just some of the positive outcomes that have resulted from MIOSHA's recent organizational and process changes. More modifications and adjustments will be implemented to improve the program.

There are a number of people who believe that significant, timely changes in an agency such as MIOSHA are nearly impossible. We will challenge that concept. MIOSHA will remain a dynamic organization, continually looking for ways to help Michigan's employers and employees "make a difference" in the safety and health for Michigan's workers.

Douglas Kalmowski

# Scaffold Collapse Fatality

# MIOSHA fines L.C. United Painting \$104,000 for fatality connected to a scaffold collapse on a water tower in Waterford Township

By: Richard Kawucha, Senior Safety Officer Construction Safety and Health Division

Construction is one of the most hazardous industries in the nation and Michigan. Only about four percent of Michigan's workforce is employed in construction. However, construction fatalities account for more than 40 percent of all MIOSHA program-related fatalities.

Falls are the single leading cause of accidents and fatalities in the Michigan construction industry. There were 24 construction fatalities in 2003–six of them caused by falls. MIOSHA Construction Safety Standard, Part 45, Fall Protection, sets forth requirements for employers to provide fall protection systems when employees are exposed to a fall distance of six feet or more.

### L.C. United Painting Fatality

On September 26, 2003, a crew of six painters from L.C. United Painting were in the process of painting and doing minor modifications to an existing 120-foot high, 1.5 million gallon capacity water tower in Waterford Township. There is a permanent steel guardrail around the top of the water tower. However, scaffolding must be used to paint areas not otherwise accessible.

The workers painting the tower were using a combination of scaffolds, which included:

- Two, two-point adjustable suspension scaffolds with bridging (to paint the lower half of the dome and outer legs).
- One, single-point adjustable suspension scaffold (to paint the upper dome).

All three scaffolds had a wheel assembly bolted to the water tower side of the scaffolds, to permit them to roll easily on the sides and top of the water tower. The scaffolds were supported by a 5/16-inch diameter steel wire rope, attached with shackles and steel wire rope chokers to the top of the water tower, within the guardrail.

Employee fall protection was provided through the use of a personal fall arrest system: body harness, lanyard rope grab, and vertical lifeline.

One worker started the day painting the upper portion of the dome, using the single-point adjustable suspension scaffold. Early that afternoon Agustin Lulaj, part owner and supervisor on site, came up to the top of the water tower and told the worker to paint the water

tower guardrail and he would paint the dome.

Just before quitting time Lulaj and the worker moved the suspension cable to the other side of a guardrail post. They used the scaffold motor to raise the scaffold to the guardrail. Working within the guardrail, the worker disconnected the suspension wire rope from its anchorage as Lulaj stayed on the scaffold, outside of the guardrail.

They moved the suspension wire rope, and the worker thought the rigging had been reconnected and secured. As the worker returned to work, both the scaffold unit and Lulaj fell. As the scaffold slid down the top of the dome, it narrowly missed one of the occupied two-point adjustable suspension scaffolds, and landed about four feet from the base of one of the water tower support legs.

Lulaj landed on the pipe rack of a company pick-up truck, parked outside the fenced enclosure for the water tower, and approximately 39 feet from the support legs of the tower. Lulaj was transported to the hospital where he was pronounced dead.

### The MIOSHA Inspection

The MIOSHA Construction Safety and Health Division began the investigation on Saturday, September 27th. Because of the condition of the equipment, the MIOSHA compliance officer recommended that work stop immediately.

Due to contract and public bond issues, an agreement was reached between the company and the customer, Waterford Township, and work was

halted. The company removed all of their scaffolding/personal fall protection from the site, and brought in replacement equipment from an outof-state rental company, and then completed the work.

As the compliance officer investigated the conditions related to the accident, he found that there were many hazardous conditions not directly related to the fatality. At that point, a comprehensive investigation was initiated.

On February 3, 2004, MIOSHA issued a total of 36 citations to L.C. United Painting, 14 were related to the accident and 22 were related to the comprehensive

inspection. The proposed penalties totaled \$104,000, of this, \$65,000 were related to the accident and \$39,000 were related to the comprehensive inspection.

The company received a total of 30 serious violations and six other-than-serious violations. A serious violation exists where there is a substantial probability that serious physical harm or death can result to an employee.

The serious violations related to the accident included:

- Failure to have a comprehensive and implemented accident prevention program to reduce serious or fatal injuries;
- Failure to provide each employee who performs work on a scaffold with training conducted by a person qualified in scaffold safety;
- Failure to have each employee who is involved in erecting, disassembling, moving, operating, repairing, maintaining, or inspecting a scaffold trained by a competent person to recognize any hazards associate with the work in question;
  - Permitting lifelines to be tied to guardrails;
- Failure to provide an employee on a single-point or a two-point adjustable scaffold with both a personal fall arrest system and a guardrail system; and
- Failure to test a single-point suspension scaffold at the beginning of each new installation.

The company has appealed the citations and penalties.  $\hfill\blacksquare$ 



The scaffold, with worker Agustin Lulaj, slid down the top of the tower dome, and landed about four feet from the base of the support legs.

# Congratulations to Michigan's

# TRW Automotive Inc. Brighton Plant



TRW Automotive's Brighton plant employees raise the MVPP Star Flag.

On May 19<sup>th</sup>, MIOSHA Director **Doug Kalinowski** presented the MVPP Star Award to the TRW Automotive Inc. Brighton facility for excellence in its workplace safety and health programs. This is TRW's fourth site in Michigan; they also have sites in Arizona and Tennessee.

"We are proud to recognize TRW Automotive today because they are an exemplary Michigan corporate citizen," said Kalinowski. "The Brighton plant's outstanding safety and health record demonstrates that a strong safety and health program goes hand in hand with increased production and profits."

# **Demonstrating Commitment**

Kalinowski presented the MVPP Star flag to **Rick Fraser**, Plant Manager; **Chris Arai**, Health Safety and Environmental Coordinator; and members of the safety committee. TRW corporate leaders, including **Kathy Grisdela**, Director of ABS Manufacturing; **Edmond Hughes**, Director of Human Resources; and **Ron Muckley**, Vice President, Braking & Suspension North America; congratulated the Brighton plant on their spectacular safety and health achievements.

"TRW Automotive prides itself as being the global leader in supplying automotive safety systems, and we want that philosophy of leadership to extend to our health, safety and environmental practices," said Grisdela. "We now have four Michigan locations within the VPP program,

demonstrating the commitment of our employees to safety in the workplace."

The Michigan Voluntary Protection Program (MVPP) Star Award recognizes employers for exemplary safety and health programs. MIOSHA established the MVPP program in 1996 to reward worksites that develop and implement outstanding safety and health programs that go beyond MIOSHA standards.

The TRW Brighton plant's incidence rates and lost work day rates are well below the Michigan average for their SIC code 3714, *Motor Vehicle Parts and Accessories*. Their total case incidence rate was 6.0 in 2001, 3.3 in 2002, and 2.5 in 2003–compared to 15.3, for all three years for the Bureau of Labor Statistics (BLS) industry average. The total lost work day cases for the plant was 1.0 in 2001, 0.0 in 2002, and 2.5 in 2003–compared to 7.6 for all three years for the BLS industry average.

"It's an honor to accept this award on behalf of the safety committee and all of our dedicated Brighton employees," said Fraser. "Together, our employees and the management team forged a dynamic partnership, which created a work environment that fosters worker protection and improves overall operations."

### Protecting People and the Environment

The MIOSHA Review Team, consisting of Doug Kimmel, Sherry Scott, Suellen Cook, and Dave Humenick, conducted nine formal and 11 informal interviews during the onsite visit. The team examined each of the required elements of the Brighton plant's safety and health management system and found them to effectively address the scope and complexity of the hazards at the plantand consistent with the high standards expected of MVPP sites.

Management commitment to employee safety is outstanding at this site. TRW's Health Safety Environment (HSE) policy states: "At TRW Automotive, we are committed to protecting the environment and the people where we live and work." Their safety and health activities include quarterly inspections, employee training, incident investigations, safety audits, a weekly newsletter, an HSE budget and staff, and

integration of safety and health issues into general operations.

Employees are actively involved in the safety and health activities and have worked hard to qualify for the MVPP award. Employees have numerous opportunities to communicate with management about safety and health issues and are kept informed of all audits, inspections and accident investigation results.

The Brighton plant has an exceptional ergonomics program. BRIEFs (Baseline Risk Identification of Ergonomic Factors) have been performed for all equipment and processes. Using the services of Human Tech, the company set up their work stations so that parts are within easy reach, and roller conveyors were installed to move parts between work stations.

### Becoming an Automotive Leader

The Brighton facility has 160 workers, and UAW Local 174 represents the employees. The plant produces anti-lock brake systems (ABS) and vehicle stability control systems for the automotive industry and has been in operation for 34 years. The plant continuously strives to improve operations and has achieved certifications such as TS-16949, ISO 14000 and Ford's Q1.

With 2003 sales of \$11.3 billion, TRW Automotive ranks among the world's top 10 automotive suppliers. Headquartered in Livonia, Michigan, the company, through its subsidiaries, employs approximately 61,000 people in 22 countries. Its products include integrated vehicle control and driver assist systems, braking systems, steering systems, suspension systems, occupant safety systems, electronics, engine components, fastening systems and aftermarket replacement parts and services.



Doug Kimmel presents the MVPP Star Plaque to Chris Arai, Brenda Lockwood, Lori Morris, Cynthia Dietrich, Cynthia Priestly, and Rick Fraser.

# Newest MVPP Star Companies!

# Huntsman Corporation Auburn Hills Facility

On May 26th, Michigan Department of Labor & Economic Growth (DLEG) Director **David Hollister** presented the MVPP Star Award to Huntsman Corporation's Auburn Hills facility for excellence in workplace safety and health programs.

"We're honored to present this premiere safety and health recognition to the employees and management of the Huntsman Auburn Hills facility," said Hollister. "This company is on the cutting edge of Michigan's rapidly expanding technology sector. And they're certainly on the cutting edge of companies that know a strong safety and health program goes hand in hand with increased production and profits."

### **Developing Worker Protections**

Hollister presented the MVPP Star flag to **Keith Day**, Vice President, Global Specialties; **Pete Panourgias**, Facilities Supervisor; and members of the **Site Safety & House-keeping Committee**. State and local elected officials, Huntsman worldwide corporate leaders, and Huntsman employees attended the presentation.

"We are proud that, as we develop new products and technologies for the 21st century, we are also developing innovative ways to protect our employees," said Day. "By placing safety and health at the forefront of our daily operating procedures, we are increasing our competitive advantage in today's global marketplace."

The Michigan Voluntary Protection Program (MVPP) Star Award recognizes employers for exemplary safety and health programs. MIOSHA established the MVPP program in 1996 to reward worksites that develop and implement outstanding safety and health programs that

go beyond MIOSHA standards.

Huntsman's incidence rates and lost work day rates are well below the Michigan average for their SIC code 2899, *Chemical Preparations*. Their total case incidence rate was 0.0 in 2001, 2.2 in 2002, and 2.37 in 2003–compared to 6.6, for all three years for the Bureau of Labor Statistics (BLS) industry average. The total lost work day cases for the plant was 0.0 in 2001, 0.0 in 2002, and 0.0 in 2003–compared to 3.1 for all three years for the BLS industry average.

"At Huntsman, everyone takes responsibility for safety and health every day," said Panourgias. "Achieving Star status acknowledges Huntsman's rigorous determination to adhere to the highest standards of workplace safety and health, and to the total involvement of all employees at this site."

# Achieving Excellence

The Huntsman Corporation is committed to achieving excellence in environmental, health and safety protection. Their environmental, health and safety protection policy states: "It is the responsibility of both management and associates to operate safe, clean and efficient facilities in an environmentally and socially responsible manner." This policy is posted at the facility and included in the Environmental, Health and Safety Procedures Manual.

Since receiving Rising Star approval on August 7, 2002, Huntsman Polyurethanes has implemented several programs, that have enhanced and strengthened their safety and health management system, and qualified them for Star status. Their incidence rates have continued to be below industry average. Several training programs have been conducted on a wide array of

safety/health topics including: machine guarding, hazard recognition, robotics safety, and general safety awareness.

The MIOSHA MVPP Review Team consisted of **Doug Kimmel**, **Richard Zdeb**, and **Chris Passamani**. The team found that management commitment and leadership continued to be strong points, as safety and health initiatives and programs are at the forefront as issues arise.



Huntsman Corporation's Auburn Hills facility employees raise the MVPP Star Flag.

The site has utilized a number of resources in complying with initial and subsequent evaluations, which include: sending employees to MIOSHA training sessions, CET consultants, private consultants, and safety/health professionals from within the Huntsman organization.

# **Producing Quality Products**

The Auburn Hills site is the Research and Development Center for the Huntsman Polyure-thanes Division. With 77 employees, the site includes business and commercial management and technical staff for the global specialties business, advanced materials business, and commercial staff for the Huntsman Polymers Group.

Huntsman Polyurethanes, an international business unit of Huntsman International LLC, produces chemicals and systems for customers in the construction, refrigeration insulation, packaging, automotive seating and interiors, furniture, footwear, composite wood products, thermoplastic polyurethanes (TPU), and adhesives, coatings, and elastomers markets. Numerous other Huntsman sites within the states of Texas and New Jersey have also earned Star status.

Huntsman Corporation LLC is North America's largest privately held chemical company. Its operating companies manufacture basic products for the world's most essential industries. Huntsman-held companies have revenues of nearly \$9 billion, more than 15,000 employees and facilities in more than 30 countries.



DLEG Director David Hollister presents the MVPP Star Flag to Huntsman Corporation's associates and management.

# Fall Protection

# Sorting Out the Issues

By: Patty Meyer, Safety Supervisor Construction Safety and Health Division

The Construction Safety and Health Division (CSHD) recently developed two division instructions regarding fall protection. The first one is Residential Fall Protection Compliance Criteria, dated June 25, 2004. The second one. Fall Protection - General Interpretations, is still in draft form and will be available in the near future. These instructions will provide guidance to CSHD compliance officers on the enforcement of fall protection requirements in Michigan, and will be available to provide answers to questions posed by employees, employers and the general public. Both of these instructions will be available on the MIOSHA Website on the link to Construction Safety Standard, Part 45, Fall Protection.

Falls are the single leading cause of accidents and fatalities in the Michigan construction industry. MIOSHA Construction Safety Standard, Part 45, Fall Protection, sets forth requirements for employers to provide fall protection systems when employees are exposed to a fall distance of six feet or more. The MIOSHA Strategic Plan addresses fall hazards in the construction industry and has placed jobsites with serious fall potential as a priority for compliance inspections.

Many questions regarding fall protection have been raised since the promulgation of OSHA Subpart M and MIOSHA's subsequent adoption of it as Construction Safety Standard, Part 45. Along the way, CSHD has attempted to answer questions either through OSHA's Letters

of Interpretation and Directives or from CSHD compliance instructions. After eight years of implementing Part 45, several versions of interpretations have evolved. This has created confusion not only for employers and employees, but also for compliance officers.

The purpose of the two CSHD instructions addressing fall protection is to provide clear and concise interpretations and guidelines for compliance with fall protection requirements on construction sites for specific work activities. These instructions have compiled many of the past interpretations and have established current guidelines for compliance with certain portions of Part 45. Below is a brief summary of each instruction. Residential Fall Protection Compliance Criteria

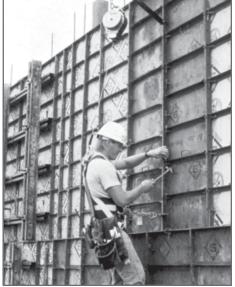
Part 45, Fall Protection,1926.501(b)(13), requires fall protection for employees engaged in residential construction activities six feet or more above lower levels. It describes three types of fall protection for residential construction activities:

- **1.** Conventional fall protection (guardrail systems, safety net systems or personal fall arrest systems).
- 2. Alternative fall protection measures (other measures described under 1926.501(b) which can be used instead of conventional fall protection).
- 3. A Fall Protection Plan as described under 1926.502(k).

As stated in 1926.501(b)(13), there is an exception to the requirement to have conventional fall protection or to adopt alternative fall protection measures under 1926.501(b) for resi-

dential construction activities. This exception allows the employer to develop a Fall Protection Plan that meets the requirements of 1926.502(k) when the employer can demonstrate that it is infeasible or creates a greater hazard to use conventional fall protection or alternative fall protection measures.

The basis for allowing an exemption for conventional fall protection or alternative fall protection measures is that the industry stated that stick-built framing is not sufficiently strong



This employee is working on concrete wall formwork. He is properly tied off and in compliance.

to anchor fall protection systems and that other means of providing protection (such as by using scaffolds) are not feasible.

As stated above, a Fall Protection Plan may be used where an employer can demonstrate infeasibility or a greater hazard of conventional fall protection or alternative fall protection measures. The Fall Protection Plan must be a written, site-specific plan that complies with the criteria in 1926.502(k). An employer engaged in residential construction and wanting to use a plan under 1926.502(k), may base its plan on the "Sample Residential Fall Protection Plan" in Appendix E of Part 45. The Appendix E plan is not assumed to be sufficient under 1926.502(k) when this work is performed at or above 48 feet.

Certain types of residential construction are exempt from having to show infeasibility or a greater hazard in order to use a fall protection plan. These groups (1, 2, 3 and 4) must have a fall protection plan, but it does not have to be written, nor does it have to be specific to the jobsite. These groups are described under Section VIII of the instruction "Alternative Fall Protection Plans." Different alternative fall protection plans are specified for different activities. Where applicable, employers complying with the requirements as stated in Section VIII of the instruction are considered to be in compliance with MIOSHA fall protection requirements.

The four groups of specific residential construction activities described in the **Residential** Fall Protection Compliance Criteria are:

**Group 1.** Installation of floor joists; floor sheathing and roof sheathing; erecting exterior walls; setting and bracing roof trusses and rafters

**Group 2.** Working on concrete and block foundation walls and related formwork.

Group 3. Performing the following activi-

Cont. on Page 19



For certain types of work classified as residential, employers may use a fall protection plan in lieu of conventional fall protection.

# The Bottom Line

# Workplace Safety and Health Makes Good Business Sense

# Hydro Automotive Structures – Holland

In the early 1950s, Bohn Aluminum was established in Holland as an automotive supplier; during its operation it has had several owners and names. In 1990, the plant was purchased by the European giant Norsk Hydro ASA, and was renamed Hydro Automotive Structures, Holland Plant.

Hydro, based in Norway, is a Fortune 500 energy and aluminum supplier operating in more than 40 countries. They are a leading offshore producer of oil and gas, the world's third-largest aluminum supplier and a leader in the development of renewable energy sources. Hydro's 36,000 employees create value by developing solutions, which enable their customers—and local communities worldwide—to become more viable.

Hydro Aluminum is one of the world's top three integrated aluminum companies, holding important market positions in America, Asia and the Pacific region. Hydro Aluminum is the leading supplier of lightweight applications to the automotive industry in the fields of: crash management, heat exchange tubing, power train, and suspension parts.

The Hydro Automotive Structures Holland plant has 420 employees, with 300 represented by UAW Local 1402, and \$75 million in annual sales. The company produces aluminum extruded automotive components such as bumpers, engine cradles, and windshield frames. Customers include GM, Ford, Chrysler, and Toyota. Automakers are increasingly looking to aluminum to help reduce vehicle weight and the Holland plant is happy to provide them with unique and expert solutions. The company is QS9000, Q1, and ISO14001 certified.

There is strong corporate and management support for Hydro Automotive Structures' health environment and safety (HES) program. The focus of their HES program, now and in the future, is to raise employee awareness of the program by utilizing employee involvement and training. The plant believes their HES program can only be strong if employees buy in and are involved in the continual implementation of the program.

The plant philosophy is that, "Safety is not just the safety managers job, it's everybody's." This year, the Holland plant has created a HES champion network, which includes:

- Both union and salary staff involvement;
- Meetings every two weeks;
- Review of procedures and policies;

- Review of incidents in the plant and elsewhere;
- Training "champions" on new procedures or policies, then bringing that information to their departments;
- Standardized department safety boards and information at department safety meetings; and
- Discussion of department safety issues, and working as a team to try to solve them.

The plant produces many large components so; ergonomics is a continuous improvement focus. They have incorporated many forms of ergonomic tools to prevent ergonomic injuries, including: lift tables, tilt tables, turn tables, lift assists, and robotics.

The plant in also very proud of their lockout program, which includes: very visual warnings, with placards and pictures attached to all equipment; employee training; and continuous audits.

The plant has utilized MIOSHA Consultation Education and Training (CET) Division services, including safety audits and safety training. CET Safety Consultant Rob Stacy nominated the company for this column.

Employee involvement and awareness has significantly reduced their number of recordable and minor incidents—**their** workforce goal is zero!



Hydro Holland plant workers Dale Mayfield and Jason Swarts stand with a recently manufactured windshield frame.

This column features successful Michigan companies that have established a comprehensive safety and health program which positively impacts their bottom line. An accident-free work environment is not achieved by good luck—but by good planning! Creating a safe and healthy workplace takes as much attention as any aspect of running a business. Some positive benefits include: less injuries and illnesses, lower workers' compensation costs, increased production, increased employee morale, and lower absenteeism.

# EMERGENCY PREPAREDNESS New Focus of MIOSHA Strategic Plan

# By: Martha Yoder MIOSHA Deputy Director

Addressing emergency preparedness is a new objective of the MIOSHA Strategic Plan, covering Fiscal Years 2004-2008, which became effective October 1, 2003. The objective calls on MIOSHA to implement emergency preparedness strategies and information to assist in the event of a terrorist or other significant threat or attack.

# 9/11 Recovery Efforts

From the first devastating moments on September 11, 2001, following the terrorist attack on the World Trade Center in New York, federal OSHA staff were in action at the site 24 hours a day, seven days a week to help protect workers involved in the recovery, demolition and siteclearing operations. The work lasted approximately eight months; with OSHA staff supplemented by assistance from safety and health staff from state plan programs, including MIOSHA. In all more than 1,000 OSHA employees worked 24/7 at the site, alongside more than 400 state plan program volunteers.

MIOSHA staff were quick to volunteer their expertise and assistance in this extraordinary effort. A total of 30 MIOSHA staff traveled to New York and worked at the site performing a variety of tasks including respiratory fit testing, site walk-throughs to identify hazards, air monitoring, and other activities.

In all, during the course of the clean-up and recovery efforts, more than 6,500 air and bulk samples were collected to test for asbestos, lead, other heavy metals, silica, and various organic and inorganic compounds. More than 24,000 evaluations of worker exposures were completed. Throughout the ten-month effort, over 131,000 respirators, 11,000 hard hats, 13,000

safety glasses and goggles, and more than 21,000 pairs of protective gloves were distributed. More than 9,000 hazards were identified. This work was critical to protecting the well being of those working at the site and ensuring tragedy was not compounded by additional deaths or serious injury.

# 9/11 Lessons Learned

In OSHA's report summarizing the work at the World Trade Center, *Inside the Green Line*, the lessons learned include the firm understanding that on September 11<sup>th</sup>, the United States entered a new era that

requires increased levels of vigilance and stronger commitments than ever before to emergency preparedness. (*Inside the Green Line* is available online at <a href="www.osha.gov">www.osha.gov</a>, or by calling 800.321.OSHA).

Following the work in New York, both federal OSHA and state plan programs for occupational safety and health, including MIOSHA, are taking action to address this important lesson learned by developing emergency preparedness strategies.

MIOSHA has established a strategic plan work group to develop strategies for emergency management activities. Safety and health expertise, and support to cleanup and recovery personnel, were identified as an emphasis area in the strategic plan. It also includes a provision for training and equipment needed by MIOSHA staff that will be providing assistance.

# MIOSHA Emergency Management Plan

The strategic plan work group is in the process of finalizing an instruction creating a

> MIOSHA Emergency Management Plan. The plan outlines the types of assistance and roles that MIOSHA will be prepared to provide should an incident occur in Michigan.

> The plan recognizes that MIOSHA is responsible for ensuring worker safety and health in the aftermath of a significant incident. MIOSHA's primary role will be to provide support to state and local authorities that are in charge of the response. Upon activation of the Emergency Management Plan, MIOSHA personnel will provide onsite response within 24 hours, and remain on site as needed.



OSHA and state plan staff were in action at the World Trade Center site to help protect workers involved in the recovery effort.

Photo courtesy of the New York Division of Safety and Health.

The plan clarifies procedures and policies for MIOSHA to follow during responses to significant catastrophic incidents. It is anticipated that MIOSHA may be called upon to provide support throughout the four phases of emergency management: planning, mitigation, response, and recovery.

When needed, and as appropriate, MIOSHA will support emergency operations for covered incidents by providing technical assistance and consultation in a non-enforcement role during initial response, recovery and rescue efforts. This assistance may include:

- Hazard analysis;
- Recommendations for hazard controls and safe work practices;
- Assistance in safety and health risk assessments:
  - Technical assistance and consultation;
- Guidance on selection and use of personal protective equipment, including respirator fit testing;
- Conducting on-site safety inspections and atmospheric monitoring;
- Information on questions related to MIOSHA regulations;
- Assistance in developing site safety plans; and
- Collecting and assembling safety and health related data.

When activities at the site are no longer related to initial response, recovery or rescue, but focused on site clean up, MIOSHA will deactivate the plan and transition to provision of services through traditional consultation education and training services and enforcement, as appropriate.

To provide assistance under the plan, two Cont. on Page 19



A total of 30 MIOSHA staff traveled to New York and performed respiratory fit testing, site hazard walkthroughs, air monitoring, and other activities.

# Increasing Health Emphasis In Construction

By: Bill Deliefde, MPH, Health Manager Construction Safety and Health Division

The MIOSHA reorganization became effective on September 29, 2003, resulting in significant structural changes to the program. Within the enforcement programs, the Occupational Health Division (OHD) was merged with construction and general industry, to form the Construction Safety and Health Division (CSHD) and the General Industry Safety and Health Division (GISHD). This resulted in seven field industrial hygienists being assigned to CSHD to focus specifically on health issues in the construction industry. Four of these hygienists came with the Asbestos Program, which also relocated from OHD.

You may ask yourself, what is so significant about this? Didn't the OHD address both construction and general industry health issues before? The answer is yes it did, but to a limited extent. The Occupational Health Division focused on responding to complaints and/or referrals, and few complaints and referrals concerned the construction industry (excluding asbestos-related issues).

# Construction Health Inspections

Since the inception of the reorganization, the CSHD has seen significant improvements in communications between its safety and health officers, in the level of cross training on safety and health issues, and on the numbers of inspections being conducted jointly by safety and health officers on construction worksites.

This has enhanced the ability of safety personnel to recognize potentially serious health issues involving exposures to lead, cadmium, asbestos, silica, noise, and other chemical agents. It has also enhanced the ability of health personnel to recognize serious safety issues on construction worksites involving fall protection, excavations/trenching, masonry wall bracing, tower erection and other subjects. As a result, we are seeing better referrals between safety and health officers.

In situations where combined safety and health inspections cannot be coordinated, safety personnel are beginning to collect samples of materials suspected of containing lead or asbestos and to obtain other evidence of work practices and procedural violations involving the disturbance and/or removal of lead or asbestos containing materials. This is enabling MIOSHA to more effectively leverage limited health enforcement resources in the construction industry.

#### Asbestos/Lead Violations Are Common

Currently, the most frequently cited serious health standard violations on construction projects involve the Asbestos Construction Standard, Part 602,1926.1101, and/or the Lead Construction Standard, Part 603,1926.62. The violations typically involve buildings under renovation or being demolished that have not been properly surveyed for asbestos-containing building materials and lead-based paints. This results in contractors unknowingly disturbing these materials without implementing proper safe work practices and procedures.

### Asbestos Building Surveys

Both the Asbestos Construction Standard, Part 602,1926.1101(k)(2), and the General Industry Asbestos Standard, Part 305,1910.1001(j)(2)(i), require that owners of pre-1981 buildings and facilities conduct inspections to determine the presence, location and quantity of asbestos-containing materials and/or presumed asbestos-containing building materials. The Asbestos Workers Accreditation Act [Act 440, P.A. 1988, as amended, sec.(3)(a)(a)] requires that these surveys must be performed by a Michigan accredited asbestos building inspector or a Certified Industrial Hygienist.

Furthermore, building/facility owners are obligated to convey building inspection results to contractors applying or bidding for work adjacent to areas containing asbestos. In the absence of building/facility inspection information, contractors must presume that all thermal system insulation (TSI), surfacing materials, and asphalt and vinyl flooring materials in pre-1981 buildings contain asbestos. They must also implement appropriate protective measures during the disturbance or removal of these materials. TSI is defined as insulation applied to pipe fittings, boilers, breeching, tanks, ducts

or other structural components to prevent heat loss or gain. Surfacing materials are those that are sprayed, troweled on or otherwise applied to surfaces (e.g., acoustical plaster on ceilings, fire-proofing materials on structural members, other materials on surfaces for acoustical, fireproofing and other purposes).

# Lead/Cadmium Paint Building Surveys

The MIOSHA lead construction standard does not specifically designate that building/facility owners must conduct lead paint surveys. It provides

specific work practices and procedures that employers must implement when performing various construction work activities involving the application, removal and/or disturbance of lead-containing materials. Work activities include, but are not limited to, manual demolition, manual scraping, heat gun applicators, power tool cleaning, lead burning, rivet busting, abrasive blasting, welding, cutting and torch burning operations. Because the standard is silent on who must perform building surveys, the responsibility falls upon employers whose employees are performing work activities that disturb and/or remove lead-containing materials.

The definition of lead in the MIOSHA standard does not contain a percent cut off by weight. Therefore, if lead is detectible in a paint being tested and an employer has employees that will be involved in any of the work operations previously listed, there are specific obligations to monitor employee exposures to lead through personal air sampling and to implement the interim protections specified in Part 603. Interim protections include providing appropriate respiratory protection, personal protective clothing and equipment, decontamination change areas, hand washing facilities, biological monitoring consisting of blood sampling/analysis for lead and zinc protoporphyrin levels, and employee training. Interim protections are required until the air sampling confirms that employees are not excessively exposed to lead.

A problem frequently identified by MIOSHA is that employers sometimes utilize field lead spot test kits or hire a consultant to perform a lead paint survey utilizing a field x-

Cont. on Page 18



Although a building survey may show no lead- or asbestos-containing materials, employees may encounter and disturb previously inaccessible materials during renovation/demolition activities. Employees must be trained to cease work immediately and report the condition.

# GRATIOT HEALTH SYSTEM

# Successfully Implements Injury Prevention Program

By: Suellen Cook, Safety Consultant Consultation Education and Training Division

Gratiot Health System, located in Alma, kicked-off a major safety and health effort in July 2003, when they purchased lifting equipment. They then contracted with Diligent<sup>TM</sup> for a three-year plan to assist in the implementation of an injury prevention program utilizing the lifting equipment.

# Reducing Lifting Injuries

Diligent<sup>TM</sup>, offered by Arjo, Inc., eliminates manual transfers and repositioning tasks by training employees to use lift-assist and transfer equipment. Diligent<sup>TM</sup> clinical consultants create an alliance with an employer, and provide customized team training to "transfer mobility coaches" prior to the program kick-off. Diligent<sup>TM</sup> consultants continue to provide monthly mentoring and monitoring of the program for at least three years, ensuring that the entire facility includes safe lifting and transferring techniques for all staff. The monthly sessions with Gratiot employees provides opportunities for problem solving and hands-on training with the lift-assist and transfer equipment.

As a result of the alliance with Arjo, Gratiot Health System has seen a reduction in lifting, transferring and mobility injuries (LTMs) greater than 50 percent in the first 10 months of the program. Diana Pray, B.S.N and Occupational Health Services Manager, explained that even though the



Robert Peglow, ER Manager, demonstrates assisting a patient out of a car utilizing the Trixie lift, with Diana Pray, OHS manager.

lifting and transferring injuries have been reduced significantly, a small spike in LTMs was noted in March of 2004. Pray said that creating a culture change within an organization can be difficult and that ergonomics can easily be put on the backburner because healthcare professionals have many different duties throughout each day.

Ergonomics is "not a person's only job," said Pray. She continued, "As an organization we can't just sit back and say that our work is done, because it's not. The key is to keep the momentum going and keep it visual. You can't just buy a lift and think that solves all your problems. The follow-up and training Diligent<sup>TM</sup> consultants provide on a monthly basis keeps the momentum going." From the May newsletter for Gratiot Health System, Lifting News: Continuing to Change the Culture, Pray writes, "We at Gratiot have been empowered to take care of our patients with the lifting equipment and maxi slides that have been purchased for us. It is up to us to take care of ourselves, and use the equipment without fail."

### Caring for Obese Patients

Like many other hospitals around the country, Gratiot has struggled with the challenge of caring for the obese patient. Obesity is defined by the Centers for Disease Control and Prevention (CDC) as, "an excessively high amount of body fat or adipose tissue in relation to lean body mass." The results of the National Health and Nutrition Examination Survey (NHANES) 1999-2000 estimated that 64 percent of U.S. adults are either overweight or obese, defined as having a body mass index (BMI) of 25 or more. BMI is a measure expressing the relationship of weightto-height. To calculate a patient's BMI, his or her body weight in kilograms is divided by the square of height in meters (wt/(ht)2). If a patient's BMI is between 25 and 29.9, the patient is considered overweight. If the BMI is greater than 30, the patient is considered obese. The CDC reported that in 2000, 19.8 percent of U.S. adults were obese. This is a 61 percent increase in obe-

Pray has been a nurse for 30 years and explained that she has seen many changes in healthcare. A significant change she reported is that the size of patients at healthcare facilities is increasing. Pray stressed that training nurses and healthcare staff to just use good body mechanics to protect themselves from lifting, transferring and mobility injuries is not enough. It is critical that lift-assist and transfer equipment be introduced and used in the workplace when obese



Jennifer McKowen, UA, 2C, demonstrates positioning a patient in the Opera lift.

patients are to be cared for with respect, with dignity and without judgment.

"An increasing number of our patients are going to be in the category of obese, and we must adapt to the new culture of taking care of them with the proper equipment to avoid injury... As a patient care staff we have been empowered to prevent injuries, now we must take ownership of our program and change forever how we think about lifting and moving patients," said Pray in the Lifting News: Continuing to Change the Culture.

Sue Sanderson, LPN and ICU Nurse, said that the Diligent™ program has had a positive impact when caring for obese patients. Sanderson said that Diligent™ staff have been absolutely supportive, particularly in the area of problem solving. "The equipment is able to get patients up. When we have the right equipment, we can deal with the weight issues. We have what we need to work with all sizes of patients," said Sanderson. She said the program is definitely "saving our backs."

### Providing a Safe Environment

When asked about the Diligent<sup>TM</sup> program, Bob Peglow, RN and Emergency Room Manager, explained that the program is saving employees' backs, saving the organization money, and the current environment is much safer for patients. Peglow said, "I can't think of any negatives. It's all positive." The Trixie lift, demon-

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# Asbestos Awareness Training

By: George Howard, Manager Asbestos Program Construction Safety and Health Division

A recent study by an environmental research group concluded that 10,000 Americans die each year from asbestos-related disease – and that many of the victims are in the construction trades.

Construction trades routinely renovate and perform limited demolition work activities within buildings. Consequently, asbestos-containing materials may be touched or disturbed. Not only does this expose construction employees and the general public to significant health hazards, it also potentially exposes the companies involved to substantial legal liabilities. Past experience indicates that much of the exposure is linked to workers who unknowingly remove or disturb asbestos-containing materials.

# Training Required by Law

To address this concern, on June 7<sup>th</sup> MIOSHA mailed information to 28,000 construction companies to inform them that they are **required by law** to provide asbestos awareness training for employees who may contact, but not disturb, asbestos-containing materials during maintenance or custodial activities. The mailing also informed the companies that if they disturbed or removed the material, additional training would be required.

In discussing this initiative, DLEG Director **David Hollister** said, "Construction employees face a considerable risk of contracting an asbestos-related disease, and yet, many are unaware of the hazards they face. Asbestos awareness training can significantly reduce asbestos exposures and related diseases."

Employees such as mechanical systems workers, plumbers, elevator repair workers, HVAC workers, construction site cleanup workers, electricians, etc., may come in contact with asbestos-containing material during maintenance or custodial activities. Therefore, these workers must receive asbestos awareness training. This training ensures that construction workers can recognize asbestos hazards and know not to disturb the material.

The training must be at least two hours in length and be conducted annually by a qualified individual. The training must cover the recognition of all building materials that may contain asbestos, the health hazards associated with asbestos exposure, and the MIOSHA regulations that must be followed if the work involves asbestos removal or disturbance activities. If a company's work activities require employees to actually disturb asbestos-containing material,

additional training, work practices, and engineering controls are mandated.

# Asbestos Hazards

Asbestos is a mineral fiber that has been used in more than 3,000 different products over the past 100 years for its insulating, acoustical, and fire protective properties. Common products that contain asbestos are pipe insulation, floor and ceiling tile, spray-on fireproofing, and boiler wrap insulation. Improper removal and/or disturbance of asbestos can cause asbestos fibers to become airborne. Inhalation of airborne asbestos fibers can cause lung cancer, a lung disease known as "asbestosis," and mesothelioma, a cancer of the chest and abdominal cavities.

The MIOSHA asbestos standards require an asbestos building survey in buildings constructed prior to 1981. The Asbestos Standard for General Industry, Part 305, specifically requires an asbestos building survey at all worksite areas where asbestos may be encountered. The Asbestos Standard for Construction, Part 602, requires a survey of the worksite before construction work subject to the standard begins. It is the employer's responsibility to obtain and review the building survey prior to conducting any work activities that may involve contact and/or disturbance of asbestos-containing material.

Maintenance activities are subject to the asbestos standards and include, but are not limited to, such work activities as upkeep and repair of leaking steam pipes, ceiling tiles, roofing, drywall, flooring, building electrical and mechanical systems; and adjustments to equipment like heating, ventilation, and air conditioning systems. These clarifications are discussed in the preamble to the OSHA Asbestos Standards

# Asbestos Awareness Outreach

The initiative being launched by the

MIOSHA Asbestos Program is an extensive, proactive education awareness campaign to address and prevent inadvertent exposure of employees and the general public to airborne asbestos fibers.

The MIOSHA Consultation Education and Training (CET) Division is working with the Asbestos Program to conduct a significant outreach initiative to provide this training. The CET Division is also partnering with trade associations and individual companies to sponsor the training. Companies can contact the CET Division at 517.322.1809 for seminar dates, locations, and partnering opportunities.

When the campaign first began, MIOSHA Director **Doug Kalinowski** said, "The MIOSHA program is dedicated to providing outreach services to protect Michigan's working men and women; and we are encouraging every construction company to use all available resources, including the MIOSHA CET Division, to provide the required asbestos training."

In addition, as part of the awareness campaign, there are many approved asbestos training sponsors, construction trade associations, and environmental consultants who are qualified to provide this training. A list of approved asbestos training providers is available on the Asbestos Program Website at <a href="https://www.michigan.gov/asbestos">www.michigan.gov/asbestos</a>.

The response to this training initiative has been outstanding, and the division has already scheduled several training courses. In addition, many consultants are also participating in this training campaign, and workers that would normally not have been trained are receiving the required training. It is hoped that this effort will reduce the potential unwarranted ill effects of airborne asbestos exposure to workers and the general public.

The Asbestos Program's primary function is to ensure that people working with asbestos are properly trained and that workers performing asbestos disturbance and/or removal activities comply with rules governing the work activity. These rules are designed to protect not only the employee performing asbestos abatement work, but also the general public that occupies the areas or buildings where the work occurs.

For more information on the Asbestos Program, please contact **Susan Baldwin**, Asbestos Program Training Coordinator or **George Howard**, Asbestos Program Manager, at 517.322.1320; or visit the Asbestos Program Website at <a href="https://www.michigan.gov/asbestos">www.michigan.gov/asbestos</a>.



Proper employee asbestos awareness training may have prevented the mishandling and disturbance of this asbestos-containing built-up roof.

# **CET Awards**

MIOSHA recognizes the safety and health achievements of Michigan employers and employees through CET Awards, which are based on excellent safety and health performance.



Front: Walter Rogers, Gene Whitman, Gary Novak, and Kathy Grisdela. Back: Howard Richardson, Jim Sheldon, Craig Austin, Bob Swanson, Ron Duncan, and Doug Kalinowski.

# TRW Automotive - Fowlerville

On September 12, 2003, TRW Automotive's Fowlerville Plant received the Michigan Voluntary Protection Programs (MVPP) **Rising Star Award** for an outstanding safety and health management system.

DLEG Deputy Director **Robert Swanson** presented the MVPP Rising Star plaque to **Kathy Grisdela**, Plant Manager, and the **Fowlerville Health and Safety Team**.

"It is with great pride that the TRW Automotive Fowlerville Team accepts this prestigious award. The 350 employees at our Fowlerville site have worked very hard to maintain an excellent health and safety record," said Grisdela.

TRW's corporate Health, Safety & Environmental policy states: "Every associate is entitled to a safe and healthful place in which to work." All TRW associates and management share a strong commitment to create a safe and healthy work environment, with accountability incorporated into all levels of the business.

TRW's Fowlerville plant produces anti-lock braking systems (ABS) and vehicle stability control systems for the automotive industry.

# Great Lakes Stamping - Holly

On June 8<sup>th</sup>, Textron Fastening Systems' Great Lakes Stamping facility received the Michigan Voluntary Protection Programs (MVPP) **Rising Star Award** for an outstanding safety and health management system.

MIOSHA Director **Doug Kalinowski** presented the award to **Rick Clayton**, president, Textron Fastening Systems; **Bob Simpson**, EVP of Global Operations, Textron Fastening Systems; **Jim O'Dea**, plant manager, Great Lakes Stamping; and the facility's **Safety and Health Committee**.

"The Holly Operations employees exemplify the dedication and commitment to safety that all of our facilities strive for globally," said Clayton

"I am extremely proud of our team," said O'Dea. "Every one of our team members at Holly Operations is committed to excellence in workplace safety and health."

Great Lakes Stamping employs 35 workers and produces metal washers for the automotive fastener industry. Textron Fastening Systems, a \$1.7 billion business unit of Textron Inc., is a leading full-service provider of value-based fastening solutions.



Textron Fastening Systems' Great Lakes Stamping facility shut down production, so all employees could attend the MVPP Rising Star celebration and luncheon.

Gladwin Safety Committee. Back: Darin Bittner, Steve Good, Bruce Long, Russ Tomes, John Doan and Brian Ciak. Front: Wendy Driver, Dawn Hebben, Ann Goodman, Linda McKone, Linda Mercer, Lori Brubaker and Dianne Vallad.

# Dura Automotive Systems - Gladwin

On February 12<sup>th</sup>, Dura Automotive Systems, Inc. of Gladwin received the MIOSHA **Ergonomic Innovation Award** for implementation of innovative ergonomic solutions and exemplary efforts at reducing worker strain.

CET Safety Consultant **Robert Carrier** presented the award to **Rick Burtis**, Plant Manager of the Dura Gladwin facility; **Sheila Wright**, Human Resource Manager; and the **Dura Gladwin Safety Committee**.

Dura Automotive Systems takes great pride in putting safety first, each and every day. The Dura Gladwin plant designed an improved chute rack system to decrease manual lifting, bending, and repetitive motion. In addition, Dura Gladwin celebrated two years without a lost-time accident on January 7<sup>th</sup>.

"It takes real teamwork, genuine concern and concentrated effort to make such an accomplishment possible," said Burtis. "Through our team's commitment, great strides in ergonomics and safety are continually being made."

Dura Automotive Systems is the world's largest independent designer and manufacturer of driver control systems and is a leading global supplier for the automotive industry.

# Education & Training Calendar

Date	Course Location	MIOSHA Trainer Contact	Phone
September			
14	Ergonomic Principles Ann Arbor	Karen Odell Ray Grabel	734.677.5259
14	Elements of a Safety & Health Management System Dearborn Heights	Linda Long Carol Kalmeta	313.317.1500
14	Supervisor's Role in Safety & Health Southfield	Richard Zdeb Wendy Shzpan	248.353.4500
15	Elements of a Safety & Health Management System Harrison	Bob Carrier Karen Kleinhardt	989.386.6629
15	Guarding for Manufacturing Houghton	Barry Simmonds Philip Musser	906.482.6817
15	MIOSHA Standards and Compliance Review/Plastics Industry Clarkston	Richard Zdeb Peggy DesRosier	248.625.5611
16	Power Lockout and Confined Space Entry Port Huron	Bernard Sznaider Terri Johns	810.985.1869
16	Ergonomic Principles Niles	Jerry Swift Tim Childs	269.687.5650
17	Asbestos Awareness Training Workshop Harrison	Sherry Scott Karen Kleinhardt	989.386.6629
21	Lockout and Machine Guarding Clarkston	Richard Zdeb Peggy DesRosier	248.625.5611
22, 23	Two-Day Mechanical Power Press Seminar Clarkston	Richard Zdeb Peggy DesRosier	248.625.5611
22, 29 & 10/	6 Safety and Health Administrator Course  Howell	Karen Odell Janie Willsmore	517.546.3920
23	Lockout and Machine Guarding  Ann Arbor	Linda Long Ray Grabel	734.677.5259
23	Scaffolds and Scaffold Platforms Saginaw	Tom Swindlehurst Carol Hemming	989.793.1120
28	Powered Industrial Truck Train-the-Trainer Gaylord	Doug Kimmel Shelly Hyatt	213.546.7261
29	Fleet Safety Grand Rapids	Rob Stacy Penny Mollica	616.698.1167
October	·	,	
12	Guarding for Manufacturing Saginaw	Richard Zdeb Wendy Shepan	888.238.4478
12	MVPP and SHARP Awards Workshop Belleville	Doug Kimmel Janet Millard	734.697.4151
14	Machine Guarding, JSA & Operator Training, Lockout/Tagout Traverse City	Anthony Neroni Shelly Hyatt	231.546.7264
18	Excavation Hazards and Soil Mechanics Midland	Tom Swindlehurst Maria Sandow	989.496.9415
20	Guarding for Manufacturing Temperance	Jennifer Clark-Denson Judith Hamburg	734.847.055
	of CET seminars may charge a nominal fee to cover the costs of equipment rental	, room rental, and lunch/refresh	
the latest sem	inar information check our website, which is updated the first of every month: v	vww.michigan.gov/miosha.	



# Construction Safety Standards Commission

Mr. Tom Boensch\*\*
Mr. Daniel Corbat
Mr. Andrew Lang
Mr. Larry Redfearn
Management

Mr. Peter Strazdas\*
Ms. Cheryl Hughes
Mr. Edward Tanzini
Mr. Timothy Wise
Public Member
Dr. Kris Mattila

# General Industry Safety Standards Commission

# Labor

Mr. James Baker
Dr. Tycho Fredericks
Mr. John Pettinga
Vacant

# Management,

Mr. Timothy J. Koury\*
Mr. Thomas Pytlik\*\*
Mr. Michael L. Eckert
Mr. George A. Reamer
Public Member
Ms. Geri Johnson

# Occupational Health Standards Commission Labor

Ms. Margaret Vissman\* Dr. G. Robert DeYoung Ms. Cynthia Holland Mr. Michael McCabe

# Management

Mr. Richard Olson\*\*
Mr. Robert DeBruyn
Mr. Michael Lucas
Mr. Douglas Williams

Public Member
Dr. Darryl Lesoski

\*Chair \*\*Vice Chair

# Standards Update

# The Work of a Standards Advisory Committee

The MIOSHA Act created three standards commissions and gave them authority to develop standards to prevent accidents and protect the life and safety of Michigan employees from recognized hazards. The Act also mandated that before a standard is promulgated or revised, the appropriate commission shall appoint an advisory committee to represent the major interests affected by the proposed standard or revision.

Who can request that a standard be revised?

- The public can approach one of the three commissions with an issue, which could open the standard for revision.
- The MIOSHA program can bring forward a problem in a standard to the one of the commissions, which could result in changes to a standard.
- Additionally, federal OSHA can judge a MIOSHA standard not to be acceptable because the provisions of that rule might be determined to be "less effective than" national provisions established by OSHA.

In January 2002, federal OSHA adopted an entirely new steel erection standard, which improved protection to ironworkers by placing special emphasis on the most serious hazards in the steel erection industry. In August 2002, MIOSHA significantly revised and updated construction safety standard **Steel Erection**, **Part 26**. Federal OSHA reviewed MIOSHA's revised fall protection measures in Part 26 and determined they provided less protection for ironworkers than the federal standard.

Last year, the Construction Safety Standards Commission appointed an advisory committee for Part 26, to examine the revised rules and propose changes for the commission to consider that would bring these rules into alliance with OSHA.

Starting this year, they have been meeting to draft the revisions. The group is skilled, knowledgeable and committed. They meet monthly for half-day sessions, and in May they joined members of the commission at the Operating Engineers Local 324 Training Center in Howell, where they observed fall protections used in the field. The advisory committee expects to have a draft ready for the commission in the fall.

# Labor Representatives:

Kurt Bowers, Ironworkers Local 340
Patrick Gleason, Ironworkers Local 25
Jim Hamric, Ironworkers Local 25
Joe Wrzesinski, Consultant
Douglas Levack, Self-employed
Michael Thibault, Ironworkers Local 8

# Management Representatives:

John Gleichman, Barton Malow Company Mark Jochen, Construction Ser. Consultant Gerald Mendek, MBM Fab. & Erectors Lawrence Kruth, Douglas Steel Fab. Corp. William Treharne, Midwest Steel, Inc. D. James Walker, Jr., Great Lakes Fabricators & Erectors Association



Gregg A. Newsom, Patrick "Shorty" Gleason, Larry Kruth, Larry Redfearn, William Treharne, Cheryl Hughes, Pete Strazdas, Kris Mattila, Marsha Parrott-Boyle, Tom Boensch, James Walker, Jr., Michael Relyin, Gerald Mendek, Jim Hamric, and Brian Newsom.

To contact any of the Commissioners or the Standards Section, please call 517.322.1845.

# Status of Michigan Standards Promulgation

(As of July 8, 2004)

# Occupational Safety Standards

# General Industry

Part 08.	Portable Fire Extinguishers	Approved by Commission for review
Part 17.	Refuse Packer Units	Approved by Commission for review
<b>Part 18.</b>	Overhead & Gantry Cranes	Advisory Committee open for review
Part 19.	Crawler, Locomotive, & Truck Cranes	Approved by Commission for review
Part 20.	Underhung Cranes & Monorail Systems	Approved by Commission for review
Part 58.	Vehicle Mounted Elevating & Rotating Platforms	Approved by Commission for review
Part 62.	Plastic Molding	Approved by Commission for review
Part 79.	Diving Operations	Approved by Commission for review
Pending	Ergonomics (Joint)	Advisory Committee open for review

# Construction

Part 01.	General Rules	. Approved by Commission for review
Part 07.	Welding & Cutting	. Approved by Commission for review
Part 08.	Handling & Storage of Materials	. At LSB for informal certification
<b>Part 12.</b>	Scaffolds & Scaffold Platforms	. Approved by Commission for review
<b>Part 14.</b>	Tunnels, Shafts, Caissons & Cofferdams	. Final, effective 02/27/03
<b>Part 16.</b>	Power Transmission & Distribution	. Approved by Commission for review
Part 25.	Concrete Construction	. Final, effective 12/19/03
Part 26.	Steel Erection	. Advisory Committee open for review
Part 30.	Telecommunications	. Approved by Commission for review
Part 31.	Diving Operations	. Approved by Commission for review
Pending	Communication Tower Erection	. Approved by Commission for review

# Occupational Health Standards

# **General Industry**

Part 431.	Hazardous Work in Labortories	. Final, effective 08/05/03
Part 501.	Agricultural Operations	. Final, effective 12/11/02
	Diving Operations	
	Grinding, Polishing & Buffing	
Pending	Agriculture  Diisocyanates	. Advisory Committee open for review
	Ergonomics (Joint)	
	• ,	

# Construction

None

# Administrative Rules

Part 11.	Recording and Reporting of Occupational Injuries and Illnesses Final, effective 12/03/02	•
Part 51.	Agriculture Final, effective 12/01/03	1

The MIOSHA Standards Section assists in the promulgation of Michigan occupational safety and health standards. To receive a copy of the MIOSHA Standards Index (updated October 2003) or for single copies and sets of safety and health standards, please contact the Standards Section at 517.322.1845, or at <a href="https://www.michigan.gov/mioshastandards">www.michigan.gov/mioshastandards</a>...

RFR Request for Rulemaking
ORR Office of Regulatory Reform
LSB Legislative Services Bureau

JCAR Joint Committee on Administrative Rules



# MIOSHA News Quiz Variance Topic: Hearing Conservation

By: Chris Passamani, Supervisor Consultation Education and Training Division

# **Questions**

I.T or F - The average 25-year-old carpenter has the hearing ability of a 50-year-old person who has not been exposed to significant occupational noise.

2. T or F – A worker exposed to 92 decibels as a daily average requires the highest level of hearing protection on the market; such as an earplug with a noise reduction rating of 33 dB, or even earmuffs over earplugs.

3. T or F - Under the current MIOSHA recordkeeping standard, the requirement for recording an occupational hearing loss occurs when an employee meets the definition of a Standard Threshold Shift.

**4.** T or F – Hearing protectors interfere with our ability to hear important sounds our machinery and equipment make.

5. T or F - In addition to permanent hearing loss, excessive noise exposure can cause tinnitus or ringing in the ears.

# **Answers**

certain ear infections, and some prescription drugs are also known to cause tinnitus. they cannot function on a "normal," day-to-day basis. It should be mentioned that aspirin, to seek medical attention. And about two million patients are so seriously debilitated that experience tinnitus to some degree. Of these, about 12 million have severe enough tinnitus 5. I rue. The American Tinnitus Association estimates that over 50 million Americans

topics/noise/faq.html#hearmachinery.

while retaining sound fidelity. Source is NIOSH webpage: http://www.cdc.gov/niosh/ protectors that professional concert musicians use that can lower the sound level the ear and only "turn-on" when the noise reaches hazardous levels. I here are even are also noise-activated hearing protectors that allow normal sounds to pass through protectors that can provide equal attenuation across all the frequency ranges. There important that the sound just be quieter without any other changes, there are hearing than others; so wearing them can make noises sound different. In cases where it's eliminate it. However, some hearing protectors will reduce certain frequencies more 4) False. Hearing protectors will lower the noise level of your equipment; it won't

. I Aqanganaq

Recording and Reporting of Occupational Injuries and Illnesses, R408.22115, Rule 1115, audiometric zero (as opposed to the baseline audiogram). Source is MIOSHA Part II, Threshold Shift; and b) and having a total hearing loss of 25 dB or more compared to an occupational hearing loss includes **both**: a) having met the definition of a Standard 3. False. Under the current MIOSHA recordkeeping standard, the criteria for recording

wearing-therefore the one that the employee is most likely to wear. to 22 dB. The best hearing protection is the one that the employee is the most comfortable a noise exposure of 92 dBA can be appropriately addressed by earplugs with a MRR of 16 have existing hearing loss). Assuming no other feasible engineering controls are available, communication to levels than may be too low for many people to hear (especially if they may be "overprotection" and increases the risk of lowering the noise, warning signals, that wearing hearing protection that reduces the noise level at the ear to less than 70 dB 2. False. Too much noise reduction is often inadvisable. European Union Guidelines suggest

I, Irue, Source is MIOSH website www.cdc.gov/niosh/noise/chhlossL.html.

# Published August 13, 2004

Following are requests for variances and variances granted from occupational safety standards in accordance with rules of the Department of Labor & Economic Growth, Part 12, Variances (R408.22201 to 408.22251).

# Variances Requested Construction

#### Part and rule number from which variance is requested

Part 10 - Lifting and Digging Equipment: Rule R408.41015a (2)(i), R408.41015a (4), R408.41018a (10), and R408.41018 (a)(21)

#### Summary of employer's request for variance

To allow the employer to access an elevated work platform that is suspended from a crane at a designated location on job site. This variance is only to be utilized for the purposes of unloading material, providing certain stipulations are adhered to.

#### Name and address of employer

Pioneer Construction

Location for which variance is requested Peoples Building, Grand Rapids

#### Part and rule number from which variance is requested

Part 10 - Lifting and Digging Equipment: Rule R408.41075a, Rule 1075a (2)

# Summary of employer's request for variance

To allow employer to use endless belt-type manlifts as access to upper levels when stairways are not available for use, provided certain stipulations are adhered to.

#### Name and address of employer

Specialty Industries, Inc.

Location for which variance is requested

King Milling Co., Lowell

# Part and rule number from which variance is requested

Part 32 - Aerial Lift Platforms: Rule R408.43209, Rule 3209 and Rule 3209 (8) (c)

### Summary of employer's request for variance

To allow employer to firmly secure a scaffold plank to the top of the intermediate rail of the guardrail system of an aerial lift for use as a work platform, provided certain stipulations are adhered to.

### Name and address of employer

Denn-Co Construction Co.

# Location for which variance is requested

Detroit Newspaper, Sterling Heights

Name and address of employer

Midwest Steel, Inc.

#### Location for which variance is requested

General Motors Paint Facility, Delta Township

Name and address of employer

Scheck Industries

# Location for which variance is requested

General Motors Paint Facility, Delta Township

# Variances Granted Construction

#### Part and rule number from which variance is requested

Part 32 - Aerial Lift Platforms: Rule R408.43209; Rule 3209 (8) (b) and Rule 3209 (9)

#### Summary of employer's request for variance

To allow employer to firmly secure a scaffold plank to the top of the intermediate rail of the guardrail system of an aerial lift for limited use as a work platform, provided certain stipulations are adhered to.

Name and address of employer

Ventcon

Location for which variance is requested

Detroit Newspapers, Sterling Heights

Name and address of employer

W. J. O'Neil Company

# Location for which variance is requested

U of M Undergraduate Science Bldg., Ann Arbor

# 74th Annual Michigan Safety Conference

The Michigan Safety Conference (MSC) is one of the nation's top safety conferences. The 74th Annual Michigan Safety Conference was held on April 20th and 21st, and offered 5,000 attendees more than 120 educational seminars, as well as nearly 200 safety exhibitors and safety demonstrations.

One of the special features of this year's conference was a forum titled: Addressing Work-Related Musculoskeletal Disorders Through Research and Workplace Ergonomic Programs. Dr. John Howard, Director, National Institute for Occupational Safety and Health (NIOSH), was the guest speaker at the forum. Other speakers included: Doug Kalinowski, Director,

Linda Long, CET Division

MIOSHA; Frank Mirer, Ph.D., Director,

UAW Health and Safety; and **Bradley Joseph**, Ph.D., Corporate Ergonomist, Ford Motor Company.

Rob Stacy, CET Division

The forum reviewed research, regulatory, and programmatic issues related to work-related Musculoskeletal Disorders (MSDs). Afer the speakers presented information on MSDs, particularly in the area of prevention, they were joined by three panel members representing Michigan universities. The panel members were: **Alfred Franzblau**, M.D., Associate Professor, University of Michigan, Environmental Health Ser-

vices; **Ken Rosenman**, M.D., Professor, Michigan State Univer-

sity, Department of Medicine; and **James Blessman Jr.**, M.D., Director, Wayne State University, Occupational and Environmental Medicine.

The conference covered a wide range of safety and health seminars from the following divisions: Chemical, Construction, Consultation Education & Training, Emergency Management, Environmental Management, Fire Safety, Healthcare/Occupational Health Nurses, Industrial, Industrial Hygiene, Insurance, Mining, Professional Safety Management,



Patrick Sullivan, CET Division

Public Employer, *Mike Mealy, CET Division*Public Utilities, Security, and Transportation.

Each year nearly 100 MIOSHA safety and health professionals and support staff are involved in seminar planning and implementation. MIOSHA seminars this year included: A MIOSHA Update by MIOSHA Director Doug Kalinowski; Construction Safety and Health Enforcement Update; When Construction Standards Apply in General Industry; MIOSHA Construction and Asbestos Inspections; Excavation Safety from the MIOSHA Enforcement Perspective; Fleet Safety—Gearing a Program to Protect People & Property; Top 25 MIOSHA Serious Safety Violations; The Science and Management of Noise Control Engineer-

ing; Blueprint for

Managing Your Safety & Health Program; Falling to Their Death—Construction Fatalities Examined; Guarding for Life! Machine Hazards & Safeguards; Air contaminants in the Construction Workplace.

The Michigan Safety Conference is a volunteer association of business, industry and government leaders from across the state. MIOSHA encourages anyone associated with safety and health in Michigan to become a part of the MSC. It will provide a valuable opportunity to network and exchange ideas and information with safety and health professionals from across the state. For information on the conference, or to volunteer, call: 517.630.8340.



Anthony Allam, CSH Division

# Safety Professional of the Year

# Michael L. Eckert CSP, CSHM

Director of Safety Services
Michigan Road Builders Association

Michael Eckert has been with the Michigan Road Builders Association (MRBA) since 1998. The MRBA is an industry trade association that provides services to over 400 contractors and associate members who perform highway, bridge and related construction and support functions.

Eckert has been a speaker and trainer for the MIOSHA construction staff and has developed supervisor and craftsperson training for MRBA. He serves on the MIOSHA General Industry Safety Standards Commission, as well as several advisory committees.

Presentations by Eckert include the Michigan Safety Conference, Construction Safety Day, the Southeast Michigan Safety Conference, Saginaw Valley Safety Council and the Lansing Area Safety Council. He served as a member of the Greater Detroit ASSE Board from 1995 to 2001.



Distinguished Service Award
Therese M. Waters

Physical Therapist

The Michigan Safety Conference presented its highest honor to an active volunteer, the Distinguished Service Award, to Therese Waters.

Waters became active as a volunteer in 1991 when she served as Vice Chair of the Professional Safety Division.

Waters was elected to the Board of Directors in 1995 and was elected Executive Secretary in 1997. She moved through the executive officer chairs and was elected President in 2000. Following her presidency, Waters has remained on the Board and also served on several committees.

Her professional life includes per diem physical therapy services to nursing home groups, area hospitals, and outpatient chronic pain centers.



# **Focused Inspections**

Cont. from Page 1

has shown directly relate to the injury and illness experience in a particular industry.

# Focused Inspection Guidelines

Like traditional wall-to-wall inspections, a focused inspection begins with an opening conference. During the opening conference for a focused inspection, the compliance officer asked the employer to describe the types of equipment and/or machines that are present in the workplace. If the site had equipment and/or machines that could cause an amputation, the compliance officer conducted a thorough inspection of the equipment and/or machines, with particular attention to employee exposure to nip points, shear points, cutting actions, other pinch points and operator training.

- The compliance officer also evaluated employee exposures during the following:
  - Regular operation of the machine,
- Setup/threading/preparation for regular operation of the machine,
  - Clearing jams or upset conditions,
- Running adjustments while the machine is operating,
  - Cleaning of the machine,
  - Oiling or greasing of the machine,
  - Scheduled/unscheduled maintenance, and
  - Lockout/tagout.

In addition, the MIOSHA 200/300 injury

logs were reviewed for amputation injuries or hazards.

When review of the focus areas demonstrated adequate compliance, the inspection was concluded. If a significant number of serious hazards were identified, the inspection was expanded to a full review of the workplace.

### Focused Inspection Results

Since launching the focused inspection pilot program, the General Industry Safety and Health Division has conducted 12 focused inspections, covering 2,573 employees. The results of the focused inspections have been positive.

Approximately 70 percent of all violations identified during the focused inspections were classified as serious. A serious classification means that a hazard exists which has a substantial probability of causing serious physical harm or death to workers, if an accident were to occur. This compares to approximately 45 percent of the violations identified during a traditional wall-to-wall inspection classified as serious. The majority of the remaining violations were other-than-serious, meaning that although the condition could cause an injury, the resulting injury would not result in death or serious physical harm.

Among the serious hazards identified during the focused inspections were lockout, machine guarding, and operator training violations. In addition, while conducting the focused inspections, compliance officers observed additional serious hazards such as electrical equipment and practices; powered industrial truck requirements; guarding of power transmission; falls from heights; and slip hazards due to lack of drainage in a wet process area, false floors, or mats.

### Focused Inspection Opportunities

Based on this experience, the focused inspection concept appears to have been very successful. MIOSHA is currently considering expanding this approach to other industries identified as a priority in the strategic plan. The strategic plan includes goals to reduce injury and illness by 20 percent in the following selected industries: Furniture Manufacturing (SIC25/NAICS337); Primary Metal Manufacturing (SIC33/NAICS331); Fabricated Metal Products (SIC34/NAIC332); Machinery Manufacturing (SIC35/NAIC333); and Transportation Equipment (SIC37/NAIC336).

To determine the prevalent hazards of the selected industries and develop focused inspection guidelines, MIOSHA is seeking stakeholder input and feedback from employer groups, labor organizations, individual employers and employees, and their representatives in the affected industries. If you are interested in participating in this process, you are invited to contact the General Industry Safety and Health Division at 517.322.1831.

# Construction Health Issues

Cont. from Page 9

ray fluorescence (XRF) instrument. Both methods of analysis have higher limits of detection for lead than a laboratory analysis. This has resulted in employers falsely believing they are working with lead-free paints. During inspections, CSHD personnel have collected samples of the same paints that had tested negative for lead by the employer. However, laboratory analysis confirmed that they did contain lead, which triggered the interim protections required by the standard. As a result, employers are advised that lead surveys utilizing lead spot test kits or XRF are acceptable providing that paint testing negative for lead is followed up with paint chip sampling and laboratory analysis utilizing appropriate technologies.

During our laboratory metal analysis, MIOSHA also typically performs a 10-metal scan that includes zinc, lead, cadmium, cobalt, nickel, iron, chromium, manganese, beryllium and copper. This testing has revealed that cadmium is often present in paint chip samples. The presence of cadmium triggers an employer's obligation to perform personal employee air monitoring for exposure to cadmium; to provide medical surveillance to employees involved in tasks specified by Part 309 (Cadmium Standard); and to provide employee training.

If air monitoring confirms employees are ex-

cessively exposed to cadmium, further work practices and personal protective equipment requirements are triggered. The MIOSHA Cadmium Standard requires employers to designate a competent person to determine if cadmium is present and employees are exposed. Part 309 states that "appropriate investigation and material testing techniques shall be used in making this determination."

Another issue encountered is that consultants hired to survey buildings for asbestos, lead or cadmium, do not always emphasize that inspections are typically limited to accessible areas of a building/facility. The reports often do not address asbestos-, lead- or cadmiumcontaining materials that may be encountered behind walls, below flooring, above ceilings or within mechanical equipment and systems. This has resulted in contractors falsely believing that work areas are free of these materials after the accessible areas have been properly abated or when they tested negatively to begin with. Upon initiating renovation/demolition activities, it is not uncommon for these contractors to encounter and disturb these previously inaccessible materials. Often, because employees have not received appropriate awareness training, they have not been alerted to watch for previously inaccessible suspect materials that may contain lead, asbestos or cadmium; to cease work activities immediately

that may disturb these suspect materials and to report the condition to appropriate supervisory personnel.

# Future Health Initiatives In Construction

The CSHD current and future strategic goal involving health is to significantly reduce employee illness and disease associated with exposures to asbestos, lead, silica and noise. A collaborative agreement recently reached with the Michigan Department of Transportation will resurrect a previous OHD lead special emphasis program involving roadway bridge maintenance/renovation work. In the future, a similar special emphasis will be implemented to focus on silica exposures during concrete road repair operations and other construction masonry work. MIOSHA health officers will also maintain their focus on building renovations and demolition activities where lead and asbestos-containing building materials are commonly encountered, and assess the potential for excessive employee exposure to noise on every construction health inspection.

MIOSHA will continue its efforts to work with various construction trade groups and associations to help contractors recognize serious health hazards associated with exposures to lead, asbestos, silica and noise, as well as the components of a safety and health program necessary to minimize exposure to these hazardous chemical and physical agents.

# **Emergency Preparedness**

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MIOSHA Disaster Response teams of 10 MIOSHA staff have been identified to make the initial response and provide the assistance outlined above. One team will work from a Lansing base, the other from Farmington. Each team will have a co-chair to coordinate training and activities during activation.

These teams require extensive equipment and supplies beyond that which MIOSHA staff generally use in the course of their routine work. To help ensure that MIOSHA is able to provide the assistance that may be needed, the Michigan State Police, Emergency Management Division, approved funding for equipment through the use of Homeland Security Grant Funds. As equipment and supplies are received, the team members will receive an orientation on how to access team equipment, as well as appropriate training. Emergency Preparedness Outreach

In addition to the activities underway to ensure staff readiness to respond, MIOSHA is also pursuing outreach activities as part of the strategic plan. Outreach will focus on increasing awareness of MIOSHA requirements for first-responders and emergency workers. It will provide an opportunity to share information on the types of assistance MIOSHA may be able to contribute should a catastrophic event occur in Michigan. Outreach efforts will also provide an opportunity to establish rapport and communication with emergency response agencies as part of the planning process.

A second outreach area identified in the MIOSHA Strategic Plan is to provide preparedness information to employees and employers to increase workplace knowledge of, and readiness for, a terrorist attack or other significant threat or attack. MIOSHA has developed a Workplace Security Booklet that provides information on four primary areas:

- Preparing for Emergencies,
- Terrorism and Industrial Chemicals,
- Terrorism and Biological/Chemical Agents, and
  - Website Information.

The booklet provides information and a comprehensive list of Internet websites for more detailed information. It is an excellent resource and the first step in identifying information and resources to assist employers in their emergency planning efforts. The booklet is on the MIOSHA website at <a href="https://www.michigan.gov/miosha">www.michigan.gov/miosha</a>, or it can be obtained by contacting the Consultation Education and Training (CET) Division at 517.322.1809.

We often read that September 11th changed the world and in so many ways that is true. As a result, state government agencies, including MIOSHA, are taking the necessary steps to address homeland security and safety concerns within Michigan.

### **Fall Protection**

Cont. from Page 6

ties when in attics and on roofs, installing: dry-wall; insulation; HVAC systems; electrical systems (including alarms, telephone and cable TV); plumbing; and carpentry.

**Group 4.** Performing roofing work (removal, repair, or installation of weatherproofing roofing materials such as shingles, tile and tar paper).

In addition, Section VII of the instruction gives guidelines, parameters, and examples of what meets the definition of "residential construction."

# Fall Protection – General Interpretations

Part 45, Fall Protection,1926.501, requires fall protection for employees who are exposed to a fall of six feet or more above lower levels for several work activities. There are alternative measures of fall protection for certain work operations. In addition, Part 25, Concrete Construction, also addresses fall protection for employees who are exposed to a fall of six feet or more above lower levels when working on formwork and reinforcing steel.

The **Fall Protection – General Interpretations** instruction addresses five specific areas regarding fall protection on construction sites:

- Working around holes and hoistways,
- Working on formwork,
- Working on reinforcing steel,
- Roofing material vendors, and
- Working on low-slope roofs (other that roofers).

This instruction provides several examples and guidelines for complying with these five specific areas. As stated above, this instruction is currently in draft form and will be available on the MIOSHA website upon completion.

It is imperative that employers provide fall protection to their workers, in order to prevent the number one cause of fatalities in Michigan. MIOSHA hopes these instructions will clarify many of the complicated issues surrounding providing appropriate fall protection for Michigan employees. If you have questions regarding these instructions, please contact the Construction Safety and Health Division at 517.322.1856.

# **Gratiot Health System**

Cont. from Page 10

strated in the photo, remains at the entrance to the emergency room so it is readily available to staff. It allows ER personnel to safely get people in and out of vehicles. The Trixie can also lift patients from the floor. Pray and Peglow both reported that the lift has reduced employee exposure to extreme postures and has helped to reduce lift, transfer and mobility injuries in the ER environment. Patients also report feeling more secure and experience less physical trauma when transferred in the Trixie lift.

The ergonomics program at Gratiot Health System continues to evolve: a study is being conducted on the surgical floors regarding accessibility to maxi-slides; a new lift was recently purchased for the morgue to eliminate manual lifts; and a ceiling lift was installed in the ICU to improve care for bariatric patients.

Gratiot's management is committed to safety and health for all staff and patients. Implementing an ergonomics program is just one component of the overall safety and health management system. To learn more about implementing effective ergonomics programs and safety and health management systems, please contact the Consultation Education and Training (CET) Division of MIOSHA at 517.322.1809.



Mary Phillips, RN, 2C, demonstrates the Stedy lift.

# Working Outdoors - Protect Yourself in the Heat & Sun

Hot summer months pose special hazards for outdoor workers who must protect themselves against heat, sun exposure, and other hazards.

Employers and employees should know the potential hazards in their workplaces and how to manage them.

MIOSHA and OSHA offer tips and information to help employers and workers stay safe throughout the summer months.

OSHA publications are available on their website at: www.osha.gov. You can also call the MIOSHA CET Division for assistance, at 517.322.1809.



# How To Contact MIOSHA

MIOSHA Complaint Hotline 800.866.4674
Fatality/Catastrophe Hotline 800.858.0397
General Information 517.322.1814
Free Safety/Health Consultation 517.322.1809

Director 517.322.1814 Doug Kalinowski Deputy Director 517.322.1817 Martha Yoder

**PHONE** 

**DIRECTOR** 

Marsha Parrott-Boyle

**DIVISION** 

Appeals	517.322.1297	Diane Phelps
Construction Safety & Health	517.322.1856	Bob Pawlowski
Consultation Education & Training	517.322.1809	Connie O'Neill
General Industry Safety & Health	517.322.1831	John Brennan
Management & Technical Services	517.322.1817	John Peck
OFFICE	PHONE	MANAGER
OFFICE Asbestos Program	PHONE 517.322.1230	MANAGER George Howard
55		
Asbestos Program	517.322.1230	George Howard
Asbestos Program  CET Grant Program	517.322.1230 517.322.1865	George Howard Jerry Zimmerman

Website: www.michigan.gov/miosha

517.322.1845

Standards Section

If you would like to subscribe to the MIOSHA News, please contact us at 517.322.1809 and provide us with your mailing address. Also if you are currently a subscriber, please take the time to review your mailing label for errors. If any portion of your address is incorrect, please contact us at the above number.



Michigan Occupational Safety and Health Administration Director: Douglas J. Kalinowski

The MIOSHA News is a quarterly publication of the Michigan Occupational Safety and Health Administration (MIOSHA), which is responsible for the enforcement of the Michigan Occupational Safety and Health (MIOSH) Act.

The purpose is to educate Michigan employers and employees about workplace safety and health. This document is in the public domain and we encourage reprinting.

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